

Blumberg & Wolk, LLC

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Attorneys for Defendants, Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., John Catalano, M.D., Jeffrey Strauss, M.D.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

<p>IN RE NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION</p> <p>This document relates to: All New Jersey Cases</p>	<p>Docket No. 1:13-md-2419-RWZ MDL No. 02419</p>
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NOTICE OF POSTPONMENT OF DEPOSITION

Defendants Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., John Catalano, M.D., Jeffrey Strauss, M.D. give notice to the Court and to all parties of the following:

1. On or about April 1, 2015 a notice of deposition was served on counsel for Barry Cadden and Glenn Chin and the deposition was scheduled to occur on May 15, 2015 and May 22, 2015 respectively.
2. The noticed parties have objected and filed a motion for protective order asking this court to excuse these witnesses from giving deposition testimony.
3. That motion will likely be heard at the May 28, 2015 status conference before the Court.
4. The defendants are working to resolve these objections but it was necessary to resort to motion practice.
5. In light of the above the Premier Defendants hereby give notice to the Court and all parties that the depositions of Barry Cadden and Glen Chin are hereby postponed until the resolution of the above referenced objections and until the resetting of these depositions at a time and place convenient for all parties.

Respectfully submitted,

Blumberg & Wolk, LLC
Attorneys for: Premier Orthopaedic and
Sports Medicine Associates of Southern
New Jersey, LLC, trading as Premier
Orthopaedic Associates, Premier
Orthopaedic Associates Surgical
Center, LLC, and Kimberley Yvette
Smith, M.D., a/k/a Kimberley Yvette
Smith-Martin, M.D., et al

By: /s/Christopher M. Wolk

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CERTIFICATE OF SERVICE

I, Christopher M. Wolk, hereby certify that this document has been filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Date: May 13, 2015

/s/ Christopher M. Wolk_____